

**IN THE UNITED STATE BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:

CHAPTER 13

Edward Franklin Dabney and
Angelea Michelle Jones
Debtors

Edward Franklin Dabney and
Angelea Michelle Jones
Movants

CASE NO. 20-00555

MOTION TO SUSPEND PAYMENTS

AND NOW, the Debtors, by and through their attorney, Dawn Cutaia of Fresh Start Law, PLLC, file this Motion to Suspend Payments and in support thereof state the following:

1. Debtors filed a Chapter 13 bankruptcy on February 14, 2020.
2. Debtors' trustee payment is \$787.00.
3. Debtors' plan was confirmed on March 24, 2022.
4. Debtors' current arrears are \$0.
5. Debtor Angelea Jones was out of work for a period of time due to illness and she had exhausted all of her sick pay and vacation. As such, Debtors fell behind in their other bills.
6. Pursuant to the instructions on the Court's website for serving Motions to Defer/Extend/Suspend plan payment, since this request is for no longer than three months, Debtors will be serving the Motion and the passive notice on the Chapter 13 Trustee and all secured creditors who are being paid through the Plan, to wit: Bridgecrest Credit, Freedom Mortgage, Jefferson Capital Systems, and Acceptance Now. A certificate of service will be filed.
7. Debtors will cure the arrears at the end of their Plan.
8. Debtor Angelea Jones is currently in a wage attachment. Counsel will be filing a motion to stop that wage attachment contemporaneously with the filing of this Motion.

WHEREFORE, Debtors respectfully request this Honorable Court allow them to suspend their Plan payment for the months of December 2022, and January and February 2023.

Date: 11/30/2022

Respectfully submitted,
/s/ Dawn M. Cutaia
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ORDER

AND NOW, upon consideration of Debtors' Motion to Suspend Payment, said Motion is hereby granted and Debtors' Chapter 13 payment is suspended for the months of December 2022, and January and February 2023.